

REMARKS

With the present amendment, claims 1, 7, and 13 have been amended to clarify that the CS-IWF communicates with the T-IWF devices via the packet (or data) network, and to make some minor corrections to the terminology. Claims 6, 19, and 20 have been amended to be consistent with their base claims and to correct minor terminology errors. It is submitted that no prohibited new matter has been added with the present amendments to the claims.

Claim 7 has been corrected in accordance with the Examiner's objection. It is therefore requested that the Examiner withdraw the objections to claims 7 – 12.

Claims 1 and 6 have been rejected as being anticipated by BORCHERING.

With respect to claim 1, BORCHERING does not teach or suggest communicating call setup information via the packet network. In contrast to independent claim 1, it is noted that BORCHERING does not signal to the SAC via the packet network. The disclosed communication via the data network terminates at the ATM switches. See for example col. 4, lines 24 – 57.

Consequently, for at least these reasons it is submitted that independent claim 1 is allowable over BORCHERING.

Claims 7, 8, 10, 12 – 14, 16, and 18 have been rejected as being anticipated by GAUSMANN et al.

With respect to claim 7, GAUSMANN et al. also do not teach or suggest

forwarding call processing information to the T-IWF device via the data network.

With respect to claim 13, GAUSMANN et al. do not teach or suggest sending call management information via the packet network. Rather, GAUSMANN et al. describe a direct communication channel between the NB-BB interface circuit and the SAC. See Fig. 4, and col. 6, lines 59 – 63.

Consequently, for at least these reasons it is submitted that independent claims 7 and 13 are allowable over GAUSMANN et al.

Claim 19 has been rejected as being anticipated by VOIT et al.

With respect to claim 19, VOIT et al. do not teach or suggest a *centralized* control and signaling inter-working function device that performs the claimed functions. Rather, VOIT et al. only disclose local devices. Fig. 3 shows the distributed architecture, while col. 7, lines 8 – 14 describe the distributed architecture. It appears that the Examiner is relying upon the router and/or processor interface to show the claimed CS-IWF device. If the router/interface is being relied upon, the Examiner's attention is respectfully directed to col. 8, lines 53, 57, and 62, as well as col. 9, line 28, which describe the GDI interface of the router (and/or the network element receiving signaling from the ISCP) as "local." Such language teaches away from the claimed centralization of the CS-IWF device.

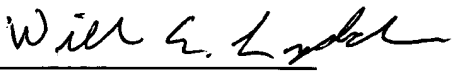
Consequently, for at least these reasons it is submitted that independent claim 19 is allowable over VOIT et al.

Dependent claims 2 - 6, 8 - 12, 14 – 18, and 20 are also believed to recite further patentable subject matter of the invention and therefore are also believed allowable over the prior art. As such, allowance of the dependent claims is deemed proper for at least the same reasons noted for the independent claims, in addition to reasons related to their own recitations. Accordingly, applicants respectfully request reconsideration of the outstanding rejections and an indication of the allowability of all of the claims in the present application.

The above amendments have been presented merely for the purpose of clarification, and not to overcome the applied prior art. Accordingly, no estoppel is deemed to result from any of the present amendments.

Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,
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